

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

REBUTTAL DECLARATION OF ROBERT SEIFERT IN SUPPORT OF PLAINTIFFS'
MOTION FOR EXPEDITED PRELIMINARY INJUNCTION

I, Robert Seifert, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. Xnxx and xvideos both have “soft core” adult content, including scenes and pictures involving clothed models or nudity with no penetration, model pages, and nude and partially clothed modeling galleries.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 21, 2023 in Prague, Czech Republic.

Dated: August 21, 2023

/s/ Robert Seifert
Robert Seifert